

Product Documentation for Creditable Grains

USDA Food and Nutrition Service (FNS) has become increasingly aware of misleading and inaccurate information on product fact sheets. School Food Authorities (SFAs) are encouraged to review the product literature carefully as they are ultimately responsible for ensuring their menus meet meal pattern requirements. It is important to note that CN labeled products provide program operators with a warranty against audit claims when the product is used according to the manufacturer's instructions. A Product Formulation Statement (PFS) does not provide any warranty against audit claims. Any crediting information received from a manufacturer other than a valid CN label should be checked by the SFA for accuracy prior to the item being included in the reimbursable meal.

USDA Memorandum TA 07-2010 REVISED January 15, 2013 found on the USDA FNS Child Nutrition Labeling website: (<http://www.fns.usda.gov/cnd/cnlabeling/foodmanufacturers.htm>) highlights common issues related to inaccurate or misleading product literature, product labels, and fact sheets; provides guidance about how product literature can be used to make purchasing decisions; and bring your attention to several sample Product Formulation Statements (PFS) that can be used to document a product's contribution to meal pattern requirements.

While schools and other program operators are not required to offer processed products with CN labels, it is important to recognize that CN labeled products ensure that the food provides the stated contribution toward CN meal pattern requirements.

Guidance for Reviewing Product Formulation Statements (PFS)

- **Review PFS prior to purchasing processed products**
A Reviewer's Checklist for Evaluating a Manufacturer Product Formulation Statement (PFS) for Meat/Meat Alternate Products is available online at (<http://www.fns.usda.gov/cnd/cnlabeling/foodmanufacturers.htm>)
- **Determine that creditable ingredients listed in the PFS match a description in the Food Buying Guide for Child Nutrition Programs (FBG) grain bread chart available at www.fns.usda.gov/tn/resources/foodbuyingguide.html**
If a PFS for a specific product claims to provide a higher credit than what is listed in the FBG, the statement must clarify all crediting ingredients, and demonstrate how the product provides that credit according to FNS regulations, guidance, or policy.
- **Verify that the credit a product contributes to meal pattern requirements is not greater than the serving size of the product.** For example, a 2.20 oz beef patty may not credit for more than 2.00 oz MMA.

Assure that the PFS proves how the claimed credit was obtained and that creditable components are visible in the finished product. It is never acceptable for a manufacturer to simply state that the product provides a certain amount of credit for the CN meal pattern.

Contact Child & Adult Nutrition Services regarding crediting components to meet meal pattern requirements.